

UNITED STATES DISTRICT COURT
for the
District of New Jersey

United States of America)
v.)
Luis Alberto Sanchez-Santos,) Case No. 20-mj- 5658 (KMW)
a/k/a Chris Martinez-Santos)
)
)
)
)

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of See Attachment A. in the county of Camden in the
District of New Jersey, the defendant(s) violated:

<i>Code Section</i>	<i>Description of Offenses</i>
8 U.S.C. Section 1326(a)	See Attachment A.

This criminal complaint is based on these facts:

See Attachment B.

Continued on the attached sheet.

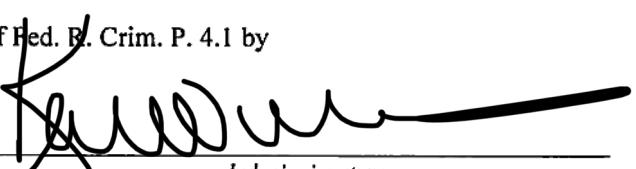


Complainant's signature

Special Agent Timothy Keating, HSI

Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by

telephone _____ (*specify reliable electronic means*). 

Date: 07/20/2020

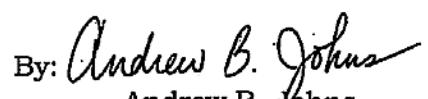
Judge's signature

City and state: District of New Jersey

Hon. Karen M. Williams, U.S. Magistrate Judge

Printed name and title

CONTENTS APPROVED
UNITED STATES ATTORNEY

By: 
Andrew B. Johns
Assistant U.S. Attorney

Date: July 20, 2020

ATTACHMENT A

Count One

On a date on or after August 19, 2014 and on or before July 10, 2020, in Camden County, in the District of New Jersey, and elsewhere, the defendant,

Luis Alberto SANCHEZ-SANTOS,
a/k/a Chris Martinez-Santos,

an alien who had been deported and removed and had departed the United States while an order of deportation and removal was outstanding, without the express consent of the Secretary of Homeland Security or the Attorney General of the United States to reapply for admission prior to his reembarkation at a place outside the United States, did knowingly and voluntarily enter, and on or about July 10, 2020 was found in the United States.

ATTACHMENT B

I, Timothy Keating, a Special Agent of Homeland Security Investigations (“HSI”), having conducted an investigation and having spoken with other individuals, do hereby depose and say:

1. Defendant Luis Alberto SANCHEZ-SANTOS, a/k/a Chris Martinez-Santos, is a native and citizen of the Dominican Republic.

2. On an unknown date before October 13, 2013, SANCHEZ-SANTOS illegally entered the United States at an unknown place. SANCHEZ-SANTOS was not admitted or paroled into the United States by an Immigration Officer.

3. On October 13, 2013, SANCHEZ-SANTOS was arrested in New Jersey by agents of U.S. Immigration and Customs Enforcement (“ICE”). The arrest was due to an Indictment, under EDPA Docket No. 2:13-cr-00509, charging SANCHEZ-SANTOS with misuse of a social security number, in violation of 42 U.S.C. Section 408(a)(7)(B). SANCHEZ-SANTOS pleaded guilty on December 12, 2013, and was sentenced on April 7, 2014 to time served and three years of supervised release.

4. On or about April 11, 2014, SANCHEZ-SANTOS was issued a Notice to Appear by an Immigration Officer in Philadelphia, Pennsylvania. On June 26, 2014, SANCHEZ-SANTOS was ordered deported from the United States to the Dominican Republic by an Immigration Judge. On August 19, 2014, SANCHEZ-SANTOS was removed to the Dominican Republic.

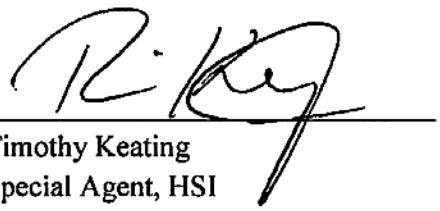
5. On a date on or after August 19, 2014 and on or before July 10, 2020, SANCHEZ-SANTOS illegally reentered the United States without the express consent of the Secretary of Homeland Security or the Attorney General of the United States to reapply for admission prior to his reembarkation at a place outside the United States.

6. On July 10, 2020, the Pennsauken Police Department arrested SANCHEZ-SANTOS for, *inter alia*, the felony of possession of heroin with intent to distribute. While incarcerated in the Camden County Correctional Facility, ICE lodged a detainer against SANCHEZ-SANTOS. He remains in the custody of the State of New Jersey pending resolution of his state charges.

7. SANCHEZ-SANTOS’s identity was confirmed through fingerprint analysis. Specifically, a fingerprint examiner from the Department of Homeland Security compared the fingerprints taken in conjunction with SANCHEZ-SANTOS prior conviction, described in Paragraph 3, *above*, with the fingerprints taken from SANCHEZ-SANTOS when he was arrested on July 10, 2020, described in Paragraph 6, *above*. The fingerprint examiner determined that the fingerprints

submitted were identical with each other and were also identical to those associated with SANCHEZ-SANTOS's FBI number.

This affidavit was sworn out via telephone, in compliance with Federal Rule of Criminal Procedure 4.1.



Timothy Keating
Special Agent, HSI



HON KAREN M. WILLIAMS
United States Magistrate Judge